

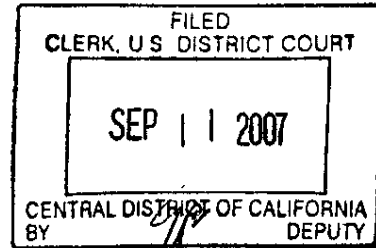
Sweet People Apparel Inc v. Forever 21 Inc

Doc. 2

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10 Attorneys for Plaintiff Sweet People Apparel, Inc.

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11 SILVER & FREEDMAN  
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15 Attorneys for Defendants Forever 21, Inc. and  
 16 2253 Apparel Inc. d/b/a Celebrity Pink Jeans

Priority \_\_\_\_\_  
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 CLERK U.S. DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 LOS ANGELES, CA  
 BY [Signature]

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION

21 SWEET PEOPLE APPAREL, INC.,

22 Plaintiff,

23 v.

24 FOREVER 21, INC. and 2253  
 25 APPAREL, INC. d/b/a CELEBRITY  
 26 PINK JEANS,

27 Defendants.

Case No. CV 07-1221 RGK (MANx)

**JOINT STIPULATION AND  
 [PROPOSED] ORDER TO  
 CONTINUE HEARING ON  
 DEFENDANT FOREVER 21 INC.'S  
 MOTION TO COMPEL**

DOCKETED (IN CM)

SEP 13 2007

BY [Signature] 007

1 Plaintiff Sweet People Apparel, Inc. ("Sweet People") on the one hand, and  
2 Defendant Forever 21, Inc. ("Forever 21"), on the other hand, through their respective  
3 counsel of record, hereby stipulate and agree as follows:

4 WHEREAS, Forever 21 filed a Motion to Compel Plaintiff to Respond to  
5 Defendant's Interrogatories and Request for Production of Documents; Request for  
6 Sanctions Pursuant to FRCP 37(d) (the "Motion") on August 22, 2007;

7 WHEREAS, the hearing on the Motion currently is scheduled to be heard by  
8 this Court on Tuesday, September 25, 2007;

9 WHEREAS, Sweet People's response to that Motion currently is due on  
10 Tuesday, September 11, 2007;

11 WHEREAS, the parties are engaged in discussions regarding the substance of  
12 the pending motion in an effort to resolve or narrow the issues raised in the Motion;

13 WHEREAS, Sweet People has provided written responses to Forever 21's  
14 interrogatories and document requests that are the subject of the Motion and is in the  
15 process of producing documents to Forever 21 in connection with the relevant  
16 document requests;

17 WHEREAS, Forever 21 is in the process of reviewing those responses;

18 WHEREAS, in order to provide the parties' additional time to resolve  
19 informally the issues that are the subject of the Motion, Forever 21 and Sweet People  
20 have stipulated and agreed to, and hereby request, a two-week continuance of the  
21 hearing date for the Motion until October 9, 2007;

22 ///

23 ///

24 ///

1 NOW, THEREFORE, the parties stipulate and agree as follows:

2 (1) Sweet People's response to the Motion shall be due on or before  
3 September 25, 2007.

4 (2) Forever 21's reply to the Motion, if any, shall be due on or before  
5 October 2, 2007.

6 (3) The hearing on the Motion shall be continued to October 9, 2007.

7  
8 Dated: September 10, 2007

ARNOLD & PORTER LLP

9  
10 By: John Malbie

Attorneys for Plaintiff Sweet  
People Apparel, Inc.

11  
12 Dated: September \_\_, 2007

SILVER & FREEDMAN

13  
14 By: see attached order

Mitchell N. Reinis  
Attorneys for Defendants Forever  
21, Inc. and 2253 Apparel, Inc.  
d/b/a Celebrity Pink Jeans

15  
16 **[PROPOSED] ORDER**

17 Good cause appearing, IT IS SO ORDERED

18  
19 DATED: September 11, 2007

Margaret A. Nagle  
Honorable Margaret A. Nagle  
United States Magistrate Judge

1 NOW, THEREFORE, the parties stipulate and agree as follows:

2 (1) Sweet People's response to the Motion shall be due on or before  
3 September 25, 2007.

4 (2) Forever 21's reply to the Motion, if any, shall be due on or before  
5 October 2, 2007.

6 (3) The hearing on the Motion shall be continued to October 9, 2007.  
7

8 Dated: September \_\_, 2007

ARNOLD & PORTER LLP

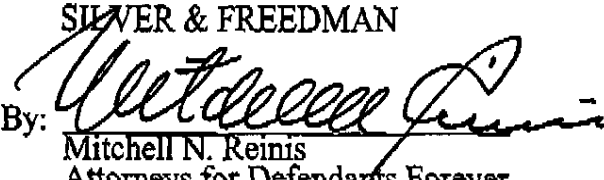
9  
10 By:

John Maltbie  
Attorneys for Plaintiff Sweet  
People Apparel, Inc.

11  
12 Dated: September 10, 2007

SILVER & FREEDMAN

13  
14 By:

  
Mitchell N. Reinis  
Attorneys for Defendants Forever  
21, Inc. and 2253 Apparel, Inc.  
d/b/a Celebrity Pink Jeans

15  
16 **PROPOSED ORDER**

17 Good cause appearing, IT IS SO ORDERED  
18

19 DATED:

20 \_\_\_\_\_  
Honorable Margaret A. Nagle  
United States Magistrate Judge  
21  
22  
23  
24  
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27  
28

**PROOF OF SERVICE**

STATE OF CALIFORNIA }  
COUNTY OF LOS ANGELES } ss

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 777 South Figueroa Street, 44th Floor, Los Angeles, California 90017-5844. On September 10, 2007, I served the foregoing document described as: **JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING ON DEFENDANT FOREVER 21 INC.'S MOTION TO COMPEL**

☒ by placing ☐ the original and ☒ a true copy thereof enclosed in sealed envelope(s) addressed as follows:

Mitchell N. Reinis  
Silver & Freedman  
2029 Century Park East, 19th Floor  
Los Angeles, CA 90067-3005

☒ **BY MAIL** I placed such envelope with postage thereon prepaid in the United States Mail at 777 South Figueroa Street, 44th Floor, Los Angeles, California 90017-5844 to the following addressee. Executed on September 10, 2007 at Los Angeles, California.

☐ **BY FEDERAL EXPRESS** I am readily familiar with Arnold and Porter's business practices of collecting and processing items for pickup and next business day delivery by Federal Express. Under said practices, items to be delivered the next business day are either picked up by Federal Express or deposited in a box or other facility regularly maintained by Federal Express in the ordinary course of business on that same day with the cost thereof billed to Arnold and Porter's account. I placed such sealed envelope for delivery by Federal Express to the offices of the addressee(s) as indicated above on the date hereof following ordinary business practices. Executed on \_\_\_\_\_ at Los Angeles, California.

☒ **FEDERAL** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on September 10, 2007

  
Gloria Turner